

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

Case No: 1:21-cv-00714-CCE-LPA

Arthur Hill,

Plaintiff,

v.

Carvana, LLC, and
Experian Information Solutions, Inc.,

Defendants.

JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER

Pursuant to Local Rule 26.2, Plaintiff Arthur Hill and Defendant Carvana, LLC (hereinafter referred to as “the Parties”) have agreed to the form and content of the proposed Stipulated Order of Protection as to Confidential Data and Documents (“Protective Order”) submitted herewith as **Exhibit A**, and the Parties respectfully request that the Court enter the Protective Order. In support of this Motion, the Parties state as follows:

1. The Parties conferred on November 18, 2021 via email, and again on April 23, 2022 via email, and agreed that discovery in this case will involve the production of documents or other material containing confidential information, including sensitive financial, proprietary, or other commercial information of the Parties. Plaintiff was provided a copy of the proposed Protective Order on April 4, 2022.

2. There is good cause for the entry of the Protective Order as this case involves, among other things, the exchange of sensitive and confidential information regarding or belonging to the Parties that is not available to the public.

3. The information requested by the Parties in discovery qualifies for protection under Federal Rule of Civil Procedure 26(c).

4. The Protective Order would provide an efficient mechanism to facilitate the exchange of such information and documents while protecting the confidential nature of such information.

5. Prior to the entry of the Protective Order, the Parties agree to treat any information produced by the Parties in accordance with the terms of the Protective Order if such information is designated by the producing party as being subject to the Protective Order.

WHEREFORE, the Parties jointly request that the Court enter the Protective Order attached as **Exhibit A** as an Order of this Court.

[SIGNATURES ON FOLLOWING PAGE]

Respectfully submitted this the 25th day of April, 2022.

/s/Arthur Hill

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Pro Se Plaintiff

/s/Ashia Crooms-Carpenter

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CERTIFICATE OF SERVICE

I, Ashia Crooms-Carpenter, hereby certify that, on April 25, 2022 a true and correct copy of the foregoing was served upon Arthur Hill using the Court's CM/ECF system:

Arthur Hill
2849 Trestle Court SW
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Pro Se Plaintiff

/s/Ashia Crooms-Carpenter
Attorney for Carvana, LLC